

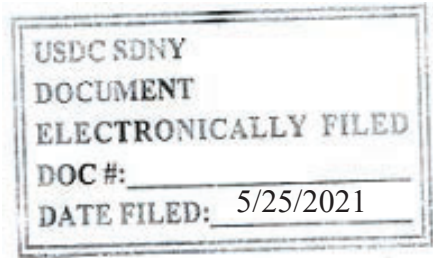


## U.S. Department of Justice

United States Attorney  
Southern District of New York

United States District Courthouse  
300 Quarropas Street  
White Plains, New York 10601

May 25, 2021



## BY CM/ECF and Electronic Mail

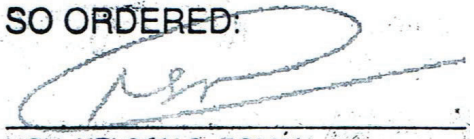
The Honorable Nelson S. Román  
United States District Judge  
Southern District of New York  
300 Quarropas Street  
New York, New York 10601

The parties' request to adjourn the Status teleconf. from May 25, 2021 until July 27, 2021 at 2:00 pm is granted. Clerk of Court requested to terminate the motion (doc. 9).

Dated: May 25, 2021

**Re: *United States v. Herbert Bullock*,  
21 Cr. 112 (NSR)**

SO ORDERED:

  
 HON. NELSON S. ROMÁN  
UNITED STATES DISTRICT JUDGE

Dear Judge Román:

The Government writes respectfully, on behalf of both parties, to request an adjournment of the status conference scheduled for today, May 25, 2021.

On February 22, 2021, a grand jury in this District returned indictment 21 Cr. 112 (NSR), which charged defendant Herbert Bullock in two counts, with: (1) theft from a program receiving federal funds, in violation of 18 U.S.C. § 666(a)(1)(A); and (2) theft of government funds, and aiding and abetting the same, in violation of 18 U.S.C. §§ 641 and 2. Bullock was arrested on March 16, 2021; he was presented before the Honorable Paul E. Davison, United States Magistrate Judge, that same day, and released on conditions. Bullock appeared before this Court by telephone on March 25, 2021. At that conference, the Court scheduled a status conference for today, May 25, 2021, and excluded time until today pursuant to 18 U.S.C. § 3161(h)(7)(A).

The Government has provided defense counsel with discovery; however, that discovery is voluminous. The Government plans on providing defense counsel with "hot docs" to assist in the defendant's review of discovery. The Government and defense counsel have also been discussing the nature of the case, the discovery, and whether a disposition short of trial would be appropriate. Indeed, if the parties appeared, they expect they would ask for an adjournment in order to continue those discussions. Accordingly, in order to preserve judicial resources, the parties respectfully request that tomorrow's conference be adjourned until the end of July. The Court's Courtroom Deputy has indicated that the Court is available for a status conference on July 27, 2021, at 2:00 pm.

Accordingly, the Government respectfully requests that the status conference be adjourned to July 27, 2021, at 2:00 pm.

Additionally, the ends of justice served by granting a continuance outweigh the best interests of the public and the defendant in a speedy trial, because, among other things, it will allow defense counsel to review discovery with his client, determine what pre-trial motions, if any, to make and prepare such motions, prepare for trial, and engage in disposition discussions. Accordingly, the Government respectfully requests that time be excluded pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), through July 27, 2021, or such other date that this Court sets for the adjourned conference. Defense counsel has consented to such an exclusion of time. I have attached a proposed order excluding time.

Please feel free to contact me with any questions or issues.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

By:

  
\_\_\_\_\_  
Michael D. Maimin  
Assistant United States Attorney  
(914) 993-1952

cc: Jason I. Ser, Esq. (by electronic mail and CM/ECF)